

# TSD File Inventory Index

Date: February 14, 2001

Initial: CMH

Facility Name: <u>GMC (Cadillac Motor Car - Clark Plant)</u>			
Facility Identification Number: <u>MID 005 356 704</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b> <u>A.2</u>	/	.1 Correspondence	
.1 Correspondence	y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	y	<b>C.1 Compliance - (Inspection Reports)</b> <u>See C.2</u>	
.3 Part A Application and Amendments	y	<b>C.2 Compliance/Enforcement</b> <u>C.2</u>	/
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications <u>C.2.2</u>	/
.6 Annual and Biennial Reports	y	<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
<b>A.4 Closure/Post Closure</b>		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A.4.1 - A.4.5</u>	/	.4 RFA Reports <u>D.1.4</u>	/
.2 Closure/Post Closure Plans, Certificates, etc <u>See A.4.1</u>		<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report	

Total 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.  
Comments: \_\_\_\_\_

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
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GORDON E. GUYER  
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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN DISTRICT HEADQUARTERS  
Waste Management Division  
38980 Seven Mile Road  
Livonia, MI 48152

December 17, 1990

Bridget A. Reisinger  
Senior Environmental Engineer  
Cadillac Motor Car Division  
General Motors Corporation  
2860 Clark Street  
Detroit, MI 48232

RE: MID 005 356 704

Dear Ms. Reisinger:

This letter is to acknowledge receipt of your letter dated December 7, 1990, indicating your compliance program for deficiencies cited during my inspection on November 6, 1990. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at (313) 953-0241.

Sincerely,

Michael K. Busse  
Environmental Quality Analyst

MKB:mkb

cc: B. Okwumabua  
U.S. EPA, Region V  
Printes Parker, Wayne Co. Hlth. Dept.

RECEIVED  
DEC 27 1990  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V





*Cadillac*

MOTOR CAR DIVISION GENERAL MOTORS CORPORATION

July 17, 1989

C.M. 36 780

OK

O: WATER -  
CC: RF

A

Mr. Valdas V. Adamkus  
Administrator  
U. S. E. P. A., Region V  
Federal Building  
230 S. Dearborn  
Chicago, IL 60604

MID 005 356 704

Dear Mr. Adamkus

Attached are copies of "Confirmation of Signatory" letters sent to Cadillac Motor Car Company - Plant Managers. The letters are signed by Mr. J. O. Grettenberger, Vice President and General Manager, Cadillac Motor Car Company - GMC, as required by Federal Regulations, provided under 40 CFR 122, 144, 270 and 403.

Please contact me at (313)554-6596 for any questions regarding this matter.

Sincerely,

R. G. Pordon  
Manager  
Environmental Engineering

RGP:ljt

RECEIVED

Attachments

JUL 20 1989

pc: Mr. David F. Hales  
Michigan Department of Natural Resources  
Mr. William Billings  
City of Detroit Water and Sewerage Department  
Mr. Anthony Ragnone  
Genesee County Drain Commission  
Mr. James Spangler  
City of Lansing Wastewater Treatment

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

[543SIGN]

*Cadillac*



July 17, 1989

Inter-Organization

Date:

Subject:

Confirmation of Signatory Authority Under  
EPA Environmental Programs

To:

Plant Manager - Cadillac Detroit/Hamtramck Assembly Center

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at the Cadillac Detroit/Hamtramck Assembly Center, located in Detroit, Michigan is hereby confirmed as a Responsible Corporate Officer of General Motors. As such, the Plant Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by the Control Authority regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System (NPDES) of  
the Clean Water Act (40 CFR 122)

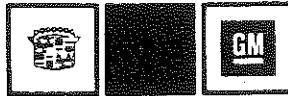
Hazardous Waste Management Program of the Resource  
Conservation and Recovery Act (RCRA) (40 CFR 270)

National Pretreatment Program of the Clean Water Act (40 CFR  
403)

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any permit applications, reports or information requests required under these programs.

J. O. Grettenberger  
Vice President and General Manager

*Cadillac*



Date: July 17, 1989

Inter-Organization

Subject: Confirmation of Signatory Authority Under  
EPA Environmental Programs

To: Plant Manager - Cadillac Grand Blanc Fabrication

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at the Cadillac Grand Blanc, located in Grand Blanc, Michigan is hereby confirmed as a Responsible Corporate Officer of General Motors. As such, the Plant Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by the Control Authority regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System (NPDES) of  
the Clean Water Act (40 CFR 122)

Hazardous Waste Management Program of the Resource  
Conservation and Recovery Act (RCRA) (40 CFR 270)

National Pretreatment Program of the Clean Water Act (40 CFR  
403)

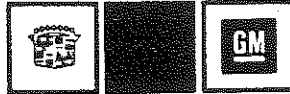
In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any permit applications, reports or information requests required under these programs.

A handwritten signature in black ink, appearing to read 'J. O. Grettenberger', is written over the typed name and title.

J. O. Grettenberger  
Vice President and General Manager



*Cadillac*



Inter-Organization

Date: July 17, 1989

Subject: Confirmation of Signatory Authority Under  
EPA Environmental Programs


To: Plant Manager - Cadillac Reatta Craft Centre

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at the Cadillac Reatta Craft Centre, located in Lansing, Michigan is hereby confirmed as a Responsible Corporate Officer of General Motors. As such, the Plant Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by the Control Authority regarding the following environmental programs at this facility:

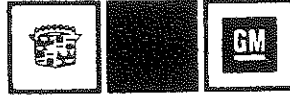
National Pollutant Discharge Elimination System (NPDES) of  
the Clean Water Act (40 CFR 122)

Hazardous Waste Management Program of the Resource  
Conservation and Recovery Act (RCRA) (40 CFR 270)

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any permit applications, reports or information requests required under these programs.

  
J. O. Gnettenberger  
Vice President and General Manager

Cadillac



A

Inter-Organization

Date: July 17, 1989

Subject: Confirmation of Signatory Authority Under  
EPA Environmental Programs

MID005  
356 704

To: Manufacturing Manager - Cadillac Motor Car Company

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Manufacturing Manager at the Cadillac Motor Car Company, located in Detroit, Michigan is hereby confirmed as a Responsible Corporate Officer of General Motors. As such, the Manufacturing Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by the Control Authority regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)

Hazardous Waste Management Program of the Resource Conservation and Recovery Act (RCRA) (40 CFR 270)

National Pretreatment Program of the Clean Water Act (40 CFR 403)

In the absence of the Manufacturing Manager due to illness, vacation or similar cause, the Acting Manufacturing Manager is designated to sign any permit applications, reports or information requests required under these programs.

A handwritten signature in black ink, appearing to read "J. O. Gnettenberger", is written over a circular stamp.

J. O. Gnettenberger  
Vice President and General Manager





# Cadillac

MOTOR CAR DIVISION GENERAL MOTORS CORPORATION

O: WATER

CC: RF

WMD ✓

April 18, 1988

Mr. Valdas V. Adamkus  
Administrator  
U.S.E.P.A. Region V  
Federal Building  
230 S. Dearborn  
Chicago, IL 60604

Dear Mr. Adamkus:

Attached is a copy of the Delegation of Authority Letter sent to Cadillac Motor Car Division Plant Managers. The Delegation Letter is signed by Mr. J. O. Grettenberger, Vice President and General Manager, Cadillac Motor Car Division - GMC, as required by Federal Regulations provided under 40 CFR 122.22, 144.32, 233.6 and 270.11.

Please contact the writer at (313) 554-6596 concerning any questions.

Sincerely,

R. G. Pordon  
Manager Environmental Engineering  
Cadillac Motor Car Division

Attachment

cc: Mr. Gordon E. Guyer  
Michigan Department of Natural Resources

Mr. William Billings  
City of Detroit Water and Sewerage Dept.

RECEIVED

APR 22 1988

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR



*Cadillac*

J.O. GRETENBERGER  
GENERAL MANAGER

April 8, 1988

SUBJECT: Delegation of Authority to  
Sign Permit Application  
Under EPA Permit Programs

FROM: J. O. Grettenberger

TO: L. J. Tibbitts, Plant Manager  
Detroit/Hamtramck Assembly Plant  
Cadillac Motor Car Division - GMC

As provided under 40 CFR 122.22, 144.32, 233.6 and 270.11 of the "Environmental Permit Regulations", the position of L. J. Tibbitts is hereby designated as my duly authorized representative for Detroit/Hamtramck Assembly Plant, Detroit, Michigan. As such, L. J. Tibbitts is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the clean Water Act (40 CFR 122)
2. Underground Infection Control Program of the Safe Drinking Water Act (40 CFR 144)
3. Dredge or fill (404) Program of the Clean Water Act (40 CFR 233)
4. Hazardous Waste Permit Program of the Resource conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.



Cadillac

J.O. GRETTEMBERGER  
GENERAL MANAGER

April 8, 1988

SUBJECT: Delegation of Authority to  
Sign Permit Application  
Under EPA Permit Programs

FROM: J. O. Grettenberger

TO: N. L. Logan, Plant Manager  
Fleetwood Assembly Plant  
Cadillac Motor Car Division - GMC

As provided under 40 CFR 122.22, 144.32, 233.6 and 270.11 of the "Environmental Permit Regulations", the position of N. L. Logan is hereby designated as my duly authorized representative for Fleetwood Assembly Plant, Detroit, Michigan. As such, N. L. Logan is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the clean Water Act (40 CFR 122)
2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)
3. Dredge or fill (404) Program of the Clean Water Act (40 CFR 233)
4. Hazardous Waste Permit Program of the Resource conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

**DEPARTMENT OF NATURAL RESOURCES**  
Gordon E. Guyer, Director

S.E. MICHIGAN FIELD OFFICE  
Waste Management Division  
505 W. Main  
Northville, MI 48167

October 30, 1987

NATURAL RESOURCES COMMISSION  
THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
GORDON E. GUYER  
IRY KAMMER  
J. STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE

Mr. Don Siegan  
Sr. Environmental Engineer  
Cadillac Motor Car Div., GMC  
2860 Clark Street  
Detroit, MI 48232

RE: MID 005356704

Dear Mr. Siegan,

On October 19, 1987, an inspection was conducted at your facility located at 2860 Clark St., Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the Land Disposal Restriction requirements of Subtitle C of the Resource conservation and Recovery Act (RCRA) of 1976, as amended.

I have determined that your facility has no deficiencies of the requirements in the areas reviewed during that inspection.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade  
Environmental Quality Analyst

FD:bs  
Enclosure  
cc: B. Okwumabua  
U.S. EPA, Region V

STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
JOHN V. MONSMA  
C. STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

March 13, 1986

B.O. C. Group  
2860 Clark St.  
Detroit, MI 48232  
Attn: Ronald G. Pordon

RE: MID 005356704

Dear Mr. Pordon:

On March 4, 1986, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

I have determined that your facility has no deficiencies of the requirements of RCRA in the areas reviewed during that inspection.

Thank you for the cooperation during my visit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade  
HAZARDOUS WASTE DIVISION

FD:jg

cc: U.S. EPA, Region V  
B. Okwumabua

# RCRA INSPECTION REPORT

EPA Identification Number:

M I D 0 0 5 3 5 6 7 0 4

Installation Name:

GMC-Buick-Oldsmobile-Cadillac Group

Location Address:

2860 CLARK ST.

City: Detroit

State: MI 48232

Date of Inspection 3-4-86

Time of Inspection (from) 9<sup>30</sup> (to) 12<sup>00</sup>

Person(s) Interviewed

Ronald G. Pardon

Title

Superu. Eng. Eng.

Telephone

313-554-6596

Donald Stegan

Sen. ENU. Eng.

- 5685

Stacy Deal

ENU. Engineering

- 6591

David Russell

ENU. Engineering

- 6599

Inspector(s)

FAYE Dade

Agency/Title

MDNR/ENU Quality Analyst

Telephone

313-458-9188

Installation Activity (mark only one box)

Inspection Form(s) -

☒ Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (No Generation or Transportation)

A

☐ Generation and Transportation

B,C

☐ Generation Only

B

☐ Transportation Only

C

# INSPECTION FORM A

## Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

### Permit application process(es) (EPA Form 3510-3)      Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

### Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.



Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N A.</u>
b. Facility expansion?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N A.</u>
c. Change of owner or operator?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N A.</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>✓</u>	<u>      </u>	<u>      </u>	<u><del>no off site</del></u> <u><del>test &amp; record</del></u>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>      </u>	<u>      </u>	<u>✓</u>	<u>NO off site waste Accepted</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
or				
b. i. Artificial or natural barrier around facility?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>6" Bob Fence</u>
and				
ii. Controlled entry?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. Danger sign(s) at entrance?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

\*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Training offered every quarter.
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Maintenance and Operation  
of Facility: 265.31

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

YES NO NI Remarks

— ✓ —

2. If required, does the facility  
have the following equipment: 265.32

a. Internal communications or  
alarm systems?

✓ — —

b. Telephone or 2-way radios  
at the scene of operations?

✓ — —

c. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

Company has own water tower + Fire dept. on site

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

✓ — —

b. Is emergency equipment  
maintained in operable  
condition?

✓ — —

4. Has owner or operator provided  
immediate access to internal  
alarms? (if needed) 265.34

~~✓~~ — ✓

5. Is there adequate aisle space  
for unobstructed movement?

✓ — —

6. Has the owner or operator attempted  
to make arrangements with local  
authorities in case of an emergency  
at the facility?

✓ — —

Company indicated  
hospital + local Fire dept  
did not accept plan, however  
not due to its contents

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES   NO   NI   Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

	YES	NO	NI	Remarks
3 Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A. no emergency. JLT

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
<b>** 1. Use of Manifest System 265.71</b>				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	N/A.
b. Are records of past shipments retained for 3 years?	✓	—	—	
<b>** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72</b>	—	—	—	N/A.
<b>** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.</b>				
<b>3. Operating Record 265.73</b>				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓	—	—	Cross-referenced with manifest not needed.
<b>***iii. A map or diagram of each cell or disposal area</b>				

\*\*\* only applies to disposal facilities



	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	_____	_____	_____	N/A
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓	_____	_____	_____
v. Reports detailing all incidents that required implementation of the Contingency Plan?	_____	_____	_____	N/A
vi. All closure and post closure costs as applicable?	✓	_____	_____	_____
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	✓	_____	_____	_____
5. **Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	_____	_____	_____	N/A.
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.	_____	_____	_____	_____

\*\* Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1 Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. estimated year of closure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has closure begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A.
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ignitable waste
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Separate concrete pad, containment outdoors.
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	<input checked="" type="checkbox"/>			NO TANK STORAGE.
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Do continuous feed systems have a waste-feed cutoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are required daily and weekly inspections done? 265.194	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?				

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

# Appendix GN

## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>50</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	_____	_____	_____	N/A
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	N/A
iii. Met the Manifest requirements?	_____	_____	_____	N/A
b. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	N/A



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

ACOB A. HOEFER  
CARL T. JOHNSON  
E.M. LAITALA  
HILARY F. SNELL  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director  
Hazardous Waste Division  
Detroit Area  
9311 Groh Road  
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

February 2, 1983

Mr. George L. Sukes  
Chief, Materials Engineering  
GMC Cadillac Motor Car  
Clark Avenue Plant  
2860 Clark Street  
Detroit, Michigan 48232

Re: MID 005356704  
Clark Avenue Plant

Dear Mr. Sukes:

Thank you for your letter of January 18, 1983, concerning the above referenced facility. You indicate that the items of non-compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) are being corrected and that hazardous wastes from the Cadillac Conner and Livonia plants are no longer received at the Clark Avenue Plant.

We appreciate your cooperation in this matter. If you have questions concerning hazardous waste management, please feel free to contact us at (313) 675-0860.

Yours truly,

HAZARDOUS WASTE DIVISION

Kenneth Burda, P.E.  
Area Engineer

A handwritten signature in cursive script, reading "Susan Norton".

Susan Norton  
Water Quality Specialist

KB:SN/sc

cc: Hazardous Waste Division, Lansing (2)



*Cadillac*

MOTOR CAR DIVISION GENERAL MOTORS CORPORATION  
DETROIT, MICHIGAN 48232

#1168

January 18, 1983

yes 4/8/83



AN AMERICAN  
STANDARD FOR THE WORLD

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JAN 20 1983

WATER QUALITY DIV.  
DIST. I

Ms. Susan Norton  
Water Quality Specialist  
Department of Natural Resources  
9311 Groh Road  
Grosse Ile, Michigan 48138

Dear Ms. Norton:

In response to your letter dated December 13, 1982, the following action has been taken to correct the deficiencies noted during the Resource Conservation and Recovery Act inspection conducted by your office at Cadillac's Clark Avenue Plant (MID005356703).

- 1&2) The internal alarm/communication system requirements provisions required by 40CFR 265.32(a) and 40CFR 265.34 are being fulfilled by an in-plant telephone system. The phone line is connected into our Plant Security offices and offices of personnel involved in the operation of the facility so emergency instructions can be provided when needed.
- 3) Subsequent to your inspection we discontinued the practice of receiving hazardous wastes from our Cadillac Conner and Cadillac Livonia plants. This eliminates the need to cross reference manifest numbers to waste loads, as stated in 40CFR 265.73(b)(2), since we will no longer receive manifested loads from off-site.

Cadillac Motor Car Division  
GENERAL MOTORS CORPORATION

*G. L. Sukes*

G. L. Sukes  
Chief Materials/Metallurgical  
Engineer

/tb

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JOE A. HOEFER  
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DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director  
Water Quality Division  
9311 Groh Road  
Grosse Ile, Michigan 48138

#1160  
STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

December 13, 1982

CERTIFIED MAIL

Mr. George L. Sukes  
Chief, Materials Engineering  
GMC Cadillac Motor Car  
Clark Avenue Plant  
2860 Clark Street  
Detroit, Michigan 48232

Re: MID005356704

Dear Mr. Sukes:

On December 3 and 6, 1982, Susan Norton of our office inspected the Cadillac Clark Avenue Plant in company with Mr. Michael Draybuck. The purpose of the visit was to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. We are pleased to note that over all, compliance at the plant is very high. Such deficiencies as existed are listed below. Sections of the law cited refer to the Code of Federal Regulations (Title 40 CFR), revised on July 1, 1981.

- (1) There was no provision for an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel. This is contrary to the requirements of 40 CFR 265.32(a). We believe this violation stands in spite of the presence of the monitoring camera, since emergency instruction cannot be provided.
- (2) By extension of Item (1), the facility is in violation of 40 CFR 265.34, which requires employee access to an internal communications or alarm system.
- (3) Although the Operating Record required by 40 CFR 265.73 states the location and quantity of each hazardous waste within the facility, it does not cross-reference the information with manifest members for incoming loads of waste.



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ACT 64

Mr. George L. Sukes  
December 13, 1982  
Page 2

Additionally, we are obliged to point out that the transport of hazardous wastes from the Connor and Livonia plants to Clark Avenue for storage is in violation of Michigan Act 64, which requires the receiving site to be licensed under Act 64 or a permitted facility under Michigan Act 245 (wastewater discharge), Act 348 (incenerator) or Act 641 (landfill). This transport to Clark Avenue should cease immediately and alternate provisions arranged.

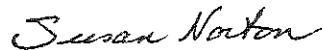
A copy of the inspection report is enclosed. We request that you respond to this office by letter no later than January 23, 1983, providing documentation of actions you have taken to correct the violations discussed above. If you have any questions, please do not hesitate to call this office at (313) 675-0860. Our thanks is extended to your staff for their cooperation and assistance during the inspection.

Yours truly,

WATER QUALITY DIVISION



Roy E. Schrameck, P.E.  
District Engineer



By: Susan Norton  
Water Quality Specialist

RES:SN/sc

Enclosure

cc: Alan Howard, OHWM (2)  
James Blazaitis  
Michael Draybuck

## RCRA Inspection Report

EPA Identification Number: 11 D 0053-56704

Installation Name: GMC CADILLAC MOTOR CAR CLARK STREET PLANT

Location Address: 2860 CLARK ST.

City: DETROIT

State: MICHIGAN 1 40232

Date of inspection: DEC 3, 1982  
DEC 6, 1982

Time of inspection (from) 2:30 P.M. (to) 4:30 P.M.  
9:00 A.M. 11:30 A.M.

Person(s) interviewed

Title

Telephone

MR. MICHAEL DRAYBUCK

Sr. Environmental Engineer

313-554-6597

Inspector(s)

Agency/Title

Telephone

SUSAN NORTON MICH. DNR WATER QUALITY DIVISION

313-675-0860

Installation Activity (mark only one box)

Inspection Form(s)

II Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

## II Treatment/Storage/Disposal (no generation or Transportation)

A

## II Generation and Transportation

B, C

## II Generation only

8

## II Transportation only

C

THE COMPANY RECEIVES HAZARDOUS WASTE FROM THE CADILLAC TONNER AND LIVONIA PLANTS. THIS IS TRANSPORTED BY A LICENSED HAULER AND STORED IN THE SAME STORAGE AREA AS THE HAZ. WASTE GENERATED BY THE CLARK ST. PLANT. THE CLARK FACILITY APPEARS IN COMPLIANCE WITH RCRA IN THIS REGARD BUT IS IN VIOLATION OF ACT 64

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ACT 64<sup>9</sup>

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>	<u>Inspection Form A section(s)</u>
S01 <input checked="" type="checkbox"/> storage in containers	I
S02 <input type="checkbox"/> storage in tanks	J
T01 <input type="checkbox"/> treatment in tanks	J
S04 <input type="checkbox"/> storage in surface impoundment	K,F
T02 <input type="checkbox"/> treatment in surface impoundment	K,F
D83 <input type="checkbox"/> disposal in surface impoundment	K,F
S03 <input type="checkbox"/> storage in waste pile	L
D81 <input type="checkbox"/> disposal by land application	M,F
D80 <input type="checkbox"/> disposal in landfill	N,F
T03 <input type="checkbox"/> treatment by incineration	O/P
T04 <input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR <input checked="" type="checkbox"/>	APPENDIX GN
TRANSPORTER <input type="checkbox"/>	APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

## Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI\* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

       X        N/A

b. Facility expansion?

       X        N/A

c. Change of owner or operator?

       X        N/A

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X                     

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X                     

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

X                     

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?  
orX                     b. i. Artificial or natural barrier around facility?  
andX                     

ii. Controlled entry?

X                     

c. Danger sign(s) at entrance?

X                     

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

X



	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N/A</u>
ii. safety and emergency equipment?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
iii. security devices?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
<i>MCV</i> <i>DEC 6</i> e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
<i>MON</i> <i>DEC 6</i> f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
ii. the name of the inspector?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
iii. a notation of the observations made?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
iv. the date and nature of any repairs or remedial actions?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
5. Do personnel training records include: 265.16				
a. Job titles?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Job descriptions?	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	—	<u>X</u>	—	_____
f. Do new personnel receive required training within six months?	—	<u>X</u>	—	<u>N/A</u> — NO NEW HIRES SINCE RCRA WENT INTO EFFECT
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	FIRST TRAINING OCCURRED IN FEB & MARCH OF 1982 — 11 YEARS HAS NOT YET ELAPSED
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<u>X</u>	—	—	_____
b. No smoking signs?	<u>X</u>	—	—	_____
c. Separation and protection from ignition sources?	<u>X</u>	—	—	_____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)1. Maintenance and Operation  
of Facility: 265.31

YES NO NI Remarks

*Diab* Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

\_\_\_ X \_\_\_

## 2. If required, does the facility have the following equipment: 265.32

*Diab* a. Internal communications or alarm systems?

\_\_\_ X \_\_\_

*DO HAVE A CONTINUOUSLY MONITORING CAMERA*

b. Telephone or 2-way radios at the scene of operations?

X \_\_\_

*"BELL" IS BEING USED*

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X \_\_\_

*COMPANY FIRE DEPT*

Indicate the volume of water and/or foam available for fire control:

*PRIMARY WATER SUPPLY IS THE RIVER*

*SECONDARY WATER SUPPLY IS THE RIVER FOR EMERGENCY USE*

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X \_\_\_

b. Is emergency equipment maintained in operable condition?

X \_\_\_

## 4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

\_\_\_ X \_\_\_

*THERE ARE NO INTERNAL ALARMS*

## 5. Is there adequate aisle space for unobstructed movement?

X \_\_\_

Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? *FIRE DEPT*

X \_\_\_

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

Y

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

Y

ENTRY FOR EMERGENCY EQUIP.  
SHOULD BE DELETED

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X

SPECIFICALLY, A MARKED-UP FOOT  
PLAN OF THE PLANT WAS DELIVERED

TO THE DETROIT FIRE DEPT.

	YES	NO	NI	Remarks
--	-----	----	----	---------

## 3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

X            

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

Y            

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X            

## 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

      X      NOT APPLICABLE

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
<b>** 1. Use of Manifest System 265.71</b>				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<u>X</u>	_____	_____	_____
b. Are records of past shipments retained for 3 years?	<u>X</u>	_____	_____	_____
<b>** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72</b>	<u>X</u>	_____	_____	_____
<b>** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.</b>				
<b>3. Operating Record 265.73</b>				
a. Does the owner or operator maintain an operating record as required in 265.73?	<u>X</u>	_____	_____	_____
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u>X</u>	_____	_____	_____
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	_____	<u>X</u>	_____	<u>YES FOR LOCATION &amp; QUANTITY,</u> <u>NO FOR CROSS-REFERENCING</u> <u>WITH MANIFEST.</u>
<b>***iii. A map or diagram of each cell or disposal area</b>				

\*\*\* only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— X — N/A

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

X — —

vi. All closure and post closure costs as applicable?

X — — *A BREAKDOWN OF CLOSURE COSTS HAS BEEN DEVELOPED AND IS ON FILE, BUT CLOSURE HAS NOT YET BEEN REQUIRED.*

#### 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X — —

#### 5.\*\*Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

— X —

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

N/A

\*\* Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

X

b. Does the plan identify:

i. maximum extent unclosed during facility life?

X

N/A FOR THIS FACILITY  
OPEN-ENDED PLAN

ii. maximum hazardous waste inventory?

X

iv. estimated year of closure?

X

SEE (1) ABOVE

v. schedule of closure activities?

X

c. Has closure begun?

X

\*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

X

N/A  
~~NO POST-CLOSURE PLAN AVAILABLE FROM EPCRA  
REQUIREMENT FOR STORAGE WITH  
REQUIREMENT TO BE MAINTAINED FOR  
SIX MONTHS AND SHOWN WITH FACILITY  
WASTE~~

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

BB. facility monitoring equipment

iii. name, address, and phone number of person or office to contact during post-closure care period?

c. Has the post-closure period begun?

d. Is the written post-closure cost estimate available? 265.144

\*Applies only to disposal facilities.



Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>X</u>	___	___	_____
2. Are containers compatible with waste in them? 265.172	<u>X</u>	___	___	_____
3. Are containers managed to prevent leaks? 265.173	<u>X</u>	___	___	_____
4. Are containers stored closed?	<u>X</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	___	___	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<u>X</u>	___	___	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	<u>N/A</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	<u>N/A</u>

## Appendix GN

## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>13</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>			
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>11/2</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>11/2</u>				

# Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EXPORTED
(If answered Yes, complete the following as applicable.)				
a. <u>Exporting</u> Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?		X		N/A

MIDC 5356704

pg

*Cadillac*

EPA

MOTOR CAR DIVISION GENERAL MOTORS CORPORATION  
DETROIT, MICHIGAN 48232



AN AMERICAN  
STANDARD FOR THE WORLD

April 1, 1982

**RECEIVED**

APR 05 1982

WATER QUALITY DIV.  
DIST. I

Mr. William E. Stone  
Water Quality Specialist  
Department of Natural Resources  
9311 Groh Road  
Grosse Ile, Michigan 48138

Dear Mr. Stone:

In response to your letter of March 9, 1982, this is to confirm that the following action has been instituted at the Cadillac Clark Avenue Plant (MID005356704) for compliance with subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended.

- (1) Facility inspection logs have been developed to document inspections, record problems, and corrections. Facility inspections are being conducted as stated in (40 CFR 265.15).
- (2) Personnel training records include job titles and names of persons filling each position as related to hazardous waste handling (40 CFR 265.16 (d) (1)).
- (3) Personnel training has been conducted and documentation entered in the personnel training record in accordance with (40 CFR 265.16 (a) (b) and (c)) and (40 CFR 265.16 (d) (4)).
- (4) The operating records now include the storage and shipment dates for each waste along with the results of the operator inspections per (40 CFR 265.73).
- (5) Hazardous waste containers are being inspected and inspection records kept as required per (40 CFR 265.174) and (40 CFR 265.15).

Please direct any questions on the above to my attention at (313) 554-5680.

Yours truly,

Cadillac Motor Car Division  
GENERAL MOTORS CORPORATION

*George L. Sukes*  
George L. Sukes  
Chief Materials/Metallurgical  
Engineer

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

CARL T. JOHNSON  
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JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909

HOWARD A. TANNER, Director

Water Quality Division  
9311 Groh Road  
Grosse Ile, Michigan 48138

April 9, 1982

Mr. George L. Sukes  
Chief Materials Engineering  
GMC Cadillac Motor Car  
Clark Avenue Plant  
2860 Clark Street  
Detroit, Michigan 48232

Dear Mr. Sukes:

We are in receipt of your April 1, 1982 letters concerning the hazardous waste management programs at the Clark Avenue, Conner Avenue and Livonia Cadillac Plants. You indicate that the plants have complied with the violations of Subtitle C of RCRA found during February, 1982 inspections.

Thank you for the cooperation in this matter. Feel free to contact us at (313) 675-0860 if you have questions concerning hazardous waste.

Yours truly,

WATER QUALITY DIVISION

*Roy E. Schrameck*

Roy E. Schrameck  
District Engineer

*William E. Stone*

William E. Stone  
Water Quality Specialist

RES:WES/sc

cc: Al Howard (6)  
John Bohunsky (3)



## STATE OF MICHIGAN



## NATURAL RESOURCES COMMISSION

RL T. JOHNSON  
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WILLIAM G. MILLIKEN, Governor

## DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909  
HOWARD A. TANNER, Director

9311 Groh Road  
Grosse Ile, Michigan 48138

March 9, 1982

Mr. George Sukes  
Chief Materials Engineering  
GMC Cadillac Motor Car  
Clark Avenue Plant  
2860 Clark Street  
Detroit, Michigan 48232

Dear Mr. Sukes:

On February 24, 1982, the Cadillac Clark Avenue Plant (MID00 5356704) was inspected to determine compliance with subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. The facility is a generator and storer of hazardous waste and subject to the Act.

Investigation found the facility to be in violation of the following requirements of subtitle C:

1. Facility inspections are not conducted. Log must be developed to document inspections and record problems and corrections. Areas subject to spills must be inspected daily. (40 CFR 265.15)
2. Personnel training records do not include job titles for all positions related to hazardous waste management nor the names of persons filling each position. (40 CFR 265.16 (d)(1))
3. Personnel training records do not document that training required in 265.16 (a)(b) and (c) has been provided. [40 CFR 265.16 (d)(4)]
4. The operating record does not include the storage and shipment dates for each waste nor does not include results of operator inspections. (265.73)
5. Containers holding hazardous waste are not being inspected. (265.174)

Please provide written documentation to this office by April 16, 1982 of actions taken to correct these deficiencies.

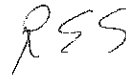


EPA ✓

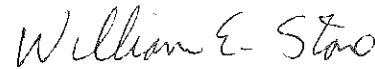
Page 2  
Mr. George Sukes

Thank you for your cooperation during the inspection. If you have any questions regarding this matter, feel free to contact me at (313) 675-0860.

Yours truly,  
WATER QUALITY DIVISION



Roy E. Schrameck  
District Engineer



William E. Stone  
Water Quality Specialist

WES/sc

cc: Al Howard OHWM (2)  
John Bohunsky/WQD Files



STATE IDENTIFICATION NUMBER ~~AK~~  
(If Applicable)

MID005356704  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: GMC Cadillac Motor Car Clark Plant  
(b) Street: 2860 Clark Street  
(C) City: Detroit (D) State: MI (E) Zip Code: 48232  
(F) Phone: (313) 554-5680 (G) County: Wayne  
(H) Operator: Same  
(I) Street: \_\_\_\_\_  
(J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_  
(M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_  
(O) Owner: Same  
(P) Street: \_\_\_\_\_  
(Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_  
(T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_  
(V) Date of Inspection: 2/24/82 (W) Time of Inspection (From) 8a (To) 11a  
(X) Weather Conditions: Overcast; light snow Flurries; wind moderate from N.E., air temp ~ 25°F

(Y) Person(s) Interviewed

Title

Telephone

James Blazaitis

Materials Engineering

313) 554-6596

Mike Draybuck

Materials Engineering

313) 554-5685

Dale Sossiaux

"

"

(Z) Chris Lovdahl  
Inspection Participants

Agency/Title

Telephone

William E. Stone

Mt. DNR WQP

313) 675-0860

Water Quality Specialist

(AA) Preparer Information

Name

Agency/Title

Telephone

Same

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

1. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

☐ D. Incineration and/or Thermal Treatment  
(O and P)

☐ E. Chemical, Physical, and Biological  
Treatment (Q)

☐ B. Air Treatment (M)

☐ C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart b)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N.A</u>
2. Facility expansion?	<u>      </u>	<u>      </u>	<u>      </u>	<u>N.A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Artificial or natural barrier around facility?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Controlled entry?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
4. Danger sign(s) at entrance?	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>      </u>	<u>✓</u>	<u>      </u>	<u>They have a log that</u>
2. Records of operator error?	<u>      </u>	<u>✓</u>	<u>      </u>	<u>lists schedules and</u>
3. Records of discharges?	<u>      </u>	<u>✓</u>	<u>      </u>	<u>procedures but have</u>
				<u>never made an</u>
				<u>inspection.</u>

\*Not Inspected

### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	—	✓	—	
5. Safety, emergency equipment?	—	✓	—	
6. Security devices?	—	✓	—	
7. Operating and structural devices?	—	✓	—	
8. Inspection log?	—	✓	—	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	✓	—	—	<i>Did not include names</i>
2. Job Descriptions?	✓	—	—	<i>Did not include supervisors nor lab personnel.</i>
3. Description of Training?	✓	—	—	
4. Records of Training?	—	✓	—	
5. Have facility personnel received required training by 5-19-81?	—	✓	—	
6. Do new personnel receive required training within six months?	—	✓	—	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	—	—	
2. No smoking signs?	✓	—	—	
3. Separation and protection from ignition sources?	✓	—	—	

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

1. Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

✓                    

(b) If required, does the Facility  
have the Following Equipment:

1. Internal communications or  
alarm systems?

✓                    

2. Telephone or 2-way Radios  
at the scene of operations?

✓                    

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓                    

Indicate the volume of water and/or foam available for fire control:

Units: They have a company fire department.

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the Owner or Operator  
established Testing and  
Maintenance Procedures  
for Emergency Equipment?

✓                    

2. Is Emergency Equipment  
Maintained in Operable  
Conditions?

✓                    

- (D) Has Owner or Operator Provided  
Immediate Access to Internal Alarms?  
(if needed)

✓

( ), Is there adequate aisle space  
for unobstructed movement?

☒ \_\_\_\_\_

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel  
must take to comply with  
§265.51 and 265.56 in response  
to fires, explosions, or any  
unplanned release of hazardous  
waste? (If the owner has a Spill  
Prevention, Control, and Counter-  
measures (SPCC) Plan, he needs  
only to amend that plan to  
incorporate hazardous waste  
management provisions that are  
sufficient to comply with the  
requirements of this Part (as  
applicable.)

☒ \_\_\_\_\_

2. Arrangements agreed to by local  
police departments, fire departments  
hospitals, contractors, and State  
and local emergency response teams  
to coordinate emergency services  
pursuant to §265.37?

☒ \_\_\_\_\_

3. Names, addresses, and phone  
numbers (office and home) of all  
persons qualified to act as  
emergency coordinators?

☒ \_\_\_\_\_

4. A list of all emergency equipment  
at the facility which includes the  
location and physical description  
of each item on the list and a  
brief outline of its capabilities?

☒ \_\_\_\_\_

5. An evacuation plan for facility  
personnel where there is a possibility  
that evacuation could be necessary?  
(This plan must describe signal(s)  
to be used to begin evacuation,  
evacuation routes, and alternate  
evacuation routes?)

☒ \_\_\_\_\_

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>not entire plan at Fire Dept.</u>
(c) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(d) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Have not as yet</u>
2. Are records of past shipments retained for 3 years	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>accepted off site waste and don't plan on doing so.</u>
(b) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Not Inspected

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

V Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ \_\_\_\_\_

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

\_\_\_\_\_ ✓ \_\_\_\_\_

c. The location and quantity of each hazardous waste within the facility?

✓ \_\_\_\_\_

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers; if waste was accompanied by a manifest.)

\_\_\_\_\_ N.A. \_\_\_\_\_

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

\_\_\_\_\_ ✓ \_\_\_\_\_ no inspections

f. Reports detailing all incidents that required implementation of the contingency plan?

\_\_\_\_\_ N.A. \_\_\_\_\_

g. All closure and past closure costs as applicable? (Effective 5-19-81)

✓ \_\_\_\_\_

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



VIII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

Yes   No   NI\*   Remarks

(A) Closure and Post Closure

- |   |                                     |                                     |                          |             |
|---|-------------------------------------|-------------------------------------|--------------------------|-------------|
| 1. Closure Plan Available for Inspection by May 19, 1981?     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____       |
| 2. Has this plan been submitted to the Regional Administrator | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | <u>N.A.</u> |
| 3. Has Closure begun?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____       |
| 4. Is closure estimate available by May 19, 1981?             | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____       |

(B) Post Closure Care and Use of Property

Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N.A.</u>
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IX. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: GMC Cadillac Clark Ave      Date of Inspection: 2/24/88  
MIPO05356704

Yes   No   NI\*   Remarks

- |   |                                     |                                     |                          |       |
|---|-------------------------------------|-------------------------------------|--------------------------|-------|
| 1. Are containers in good condition?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____ |
| 2. Are containers compatible with waste in them?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____ |
| 3. Are containers stored closed?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____ |
| 4. Are containers managed to prevent leaks?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____ |
| 5. Are containers inspected weekly for leaks and defects?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| 6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | _____ |

Indicate if waste is: ☐ Ignitable, ☐ Reactive

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

J  
TANKS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				<i>Indicate if waste is:</i> <input checked="" type="checkbox"/> Ignitable <input type="checkbox"/> Reactive
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required Certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required Signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the Owner or Operator Submit Exception Reports when Needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A.

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transfer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	—	<u>are being retained</u>
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	—	—	✓	_____

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	—	✓	—	_____
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(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	_____
c. Met the Manifest requirements?	—	—	—	_____
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?	—	—	—	_____

X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	_____	_____	_____	_____
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The facility assembles Cadillacs and produces some component parts. Activities include machining, painting, electroplating and plastic injection molding.

The company has seven hazardous waste streams. These have been identified by sampling all wastes and performing required analysis. The hazardous wastes are tagged right at the internal site of generation and the hazardous properties are recorded on the container. The containers are transferred to ~~area~~ newly constructed outdoor containment area. The area is diked and sloped. There is a separate diked area within the containment site for storage of ignitables. The containers are marked with accumulation date and all appeared to be in good condition. Two of the ~~the~~ containers are dumpsters for storage of sludges. Runoff goes to the plants Wastewater Treatment Plt.

### Violations:

1. No General Facility inspections.
2. Personnel Training Records are not complete. Required training has not been provided.
3. Operating Record does not include method and date of each wastes storage and shipment. Nor does it include results of operator inspections.
4. Containers holding hazardous waste are not being inspected.